

RECEIVED

ORIGINAL
FILE

DEC 24 1991

Federal Communications Commission
Office of the Secretary

December 23, 1991

Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, DC 20554

RE: PETITION FOR RULE MAKING
RM-7869

RECEIVED

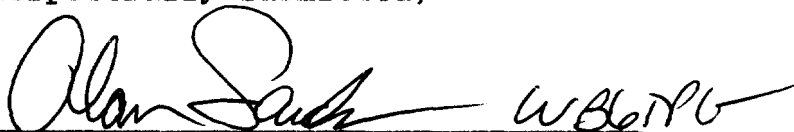
DEC 23 1991

Dear Ms. Searcy:

FCC MAIL BRANCH

Please find enclosed one original and five copies of my comments on the above captioned matter. Sufficient copies are enclosed to insure each Commissioner receives a copy.

Respectfully submitted,



Alan Sanders, WB6TPG
3767 Madras Drive
Chino, CA 91709

075

RECEIVED

DEC 24 1991

Before the
Federal Communications Commission

Federal Communications Commission
Office of the Secretary

displaced in NPRM 87-14. If you accept this petition for rule making, another 17 repeaters in the Southern California will be displaced. Where will they go? The ARRL says, and I quote "A few may not be able to move, especially in Southern California, **and may have to go off the air**". I think not! I have personally invested well over \$17,000 dollars in my system, and have the receipts to prove it. In fact the ARRL also knows this since they have an itemized list of my equipment for an insurance policy set up by the ARRL. Does it make sense to you to displace active users who currently have equipment on the air, many since the late 70's. To quote a popular movie line, "The needs of the many outweigh the needs of the one". The one I indicate, relates to a survey of all members of the 1.25 Meter community in Southern California who were asked where their operating interests are. Less than 1% indicate weak signal, SSB, and other experimental operations. Again, you just took away 40% of our band, and may ask that we continue to erode it away by special interest groups who pressured the ARRL into making this ludicrous petition opposing Amateurs against Amateurs. I can assure you the ARRL does NOT have my interest in mind, or the majority of users who will let you know in this comment period. I have invested heavily into the 1.25 Meter band, and will personally suffer financial disaster if this petition is adopted. Please bear in mind that a repeater is crystal controlled. Personal investment in equipment, which is useless in other bands include duplexers, circulators, antennas, additional filters and

cavities that are required to allow a quality FM repeater to filter intermod, and other potential interference associated with operation on a high density mountaintop. The United States Department of Agriculture assess a yearly fee for the privilege for using Forestry land to house our repeaters in private company buildings. These companies do not out of the love of Amateur radio provide hilltop space in their building free of charge. In fact, I pay \$100.00 a month for the privilege to provide a service to the Amateur community. My repeater currently has a realistic user base of over 160 Amateur Radio Operators. The benefits of this ONE frequency , to put it in your own words, "Best serves

Your Report and Order on the matter of 87-14 informed us that the ARRL Repeater Directory provides the best representation of the Amateur fixed, mobile, and repeater operations as noted in section 32, page 5 of the Report and Order, released September 6, 1988. Since the FCC feels the Repeater Directory indicates accurate amateur loading, let me also quote the ARRL Repeater Directory, which is titled "BAND PLANS". It states, "The ARRL supports regional frequency coordination efforts by amateur groups. Band plans are recommendations based on a consensus as to good Amateur operating practice on a nationwide basis.

In some cases, however, local conditions may dictate a variation from the national band plan. In these cases, the written determination of the REGIONAL FREQUENCY COORDINATING BODY shall prevail and be considered good amateur operating practice in that region." If the league believes in this theory, then one must ask Why!, are they issuing this petition? I believe no one member of the ARRL board of directors are active on the 1.25 Meter band and should not dictate decisions that area coordinating councils should make. Also, we are still licking our wounds from NPRM 87-14, so intervention again by the FCC in the 1.25 Meter band will only cause extreme animosity against the FCC and certainly against the ARRL, which is already taking effect. PLEASE!, don't intervene in affairs that are best left to local area coordination councils. Weak signal use of 150 Khz make good sense outside major metropolitan areas, but

not within them at the incredible expense of displacing amateurs with repeaters operating on the frequencies you propose will be partitioned to weak signal interests if adopted. I trust you will closely review requests from both sides of this issue. Perhaps, it is best to defer the matter back to the ARRL and request that local area coordinators try to accommodate ALL displaced uses as best as humanly possible. Those few who have elected to solicit the ARRL to voice their concerns to you, have NEVER attempted to contact the Southern California 220 Spectrum Management Association to voice their concern. In fact, prior to the league filing this proposal, one member of the frequency board for the 220 Spectrum Management Association, contacted one of the league members in support of this proposal, to discuss possible options. Their reply was, we will settle for nothing less than 150 Khz! With this attitude, it is best to advise the league to work with us, or use the weak signal band on two meters and six meters, where the propagation behaves much like the 1.25 Meter band.

On Friday, December 20th, 1991, I phoned David Sumner, Executive Vice President of the ARRL, and asked him how this petitioned had started. I was basically astonished to find that although all parties are in the Communications field, no one has bothered to speak with either side involved in this petition. To make a long story short, Mr Sumner was surprised to learn that Southern California was indeed

willing to give a greater amount of spectrum to the weak signal community, but no interest was shown in the May Southern California band plan meeting. We offered 40 Khz to them, and the TWO people representing the weak signal community told us that 10 Khz would be adequate due to the immense amount of people who have yet to be re-allocated into the upper three megahertz now allocated by the 87-14 rulemaking ~~3008 and~~ ^{to the} The league decision to file this was due to a misunderstanding that Southern California was unwilling to work with the weak signal community. This is indeed not true, and can be easily verified.

For the above mentioned reasons, the writer respectfully asks the Commission to abandon the proposed allocation of 222.000 to 222.150 Mhz, to weak signal, and instead defer the matter back to the ARRL for resolution with the local area coordination council.

Respectfully Submitted,
December 23, 1991

A handwritten signature in dark ink, appearing to be "R. S. L.", is written over the typed name and date.